

## REMARKS

Claims 1-32 are pending. Claims 1, 15 and 27 are amended herein.

### Response to Examiner's Comments

In the Advisory Action mailed June 3, 2003, the Examiner maintains his rejection of independent Claims 1, 15 and 27 under 35 U.S.C. § 103(a) based on the combination of Maruyama et al. ("Maruyama;" US 6,385,389) and Yuen et al. ("Yuen;" US 5,488,409). The Examiner acknowledges that Maruyama fails to disclose an object identifier that is unique, as recited in independent Claims 1, 15 and 27.

With regard to Yuen, the Examiner is asked to consider an example in which two video cassette recorders (VCRs) are operated at the same time side-by-side. This is a simplified case, but will help in explaining the Applicant's understanding of Yuen.

Each VCR receives a TP data packet. As described by Yuen, the TP data packet is provided in the vertical blanking interval (VBI) that is part of a broadcast signal. As a broadcast signal, the TP data packet would be received by each of the VCRs. Thus, each VCR receives the same TP data packet. The TP data packet received by each VCR includes a TID (tape identifier) and a program number. Thus, each VCR receives the same TID and program number. As such, there is nothing unique about the TID or the program number.

According to Yuen, the VCRs can be made to act on the tape recorded by each VCR; specifically, a user can insert a marker at a user-selected point in the recorded tape. Whether by coincidence or on purpose, a user can mark the same point in each tape recorded by the two VCRs. As such, there is nothing unique about such a marker, even in combination with the TID and/or program number.

In summary, the Applicants respectfully submit that Yuen, alone or in combination with Maruyama, does not show or suggest an object identifier that is unique. A more detailed discussion of the claims and the rejections of the claims follows.

#### 103(a) Rejections

Claims 1-2, 4-9, 11-12, 14-22, 24-25, 27 and 29-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Maruyama in view of Yuen. The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 1-2, 4-9, 11-12, 14-22, 24-25, 27 and 29-32 is not anticipated nor rendered obvious by Maruyama and Yuen, alone or in combination.

Applicant respectfully directs the Examiner to independent Claims 1, 15 and 27. Claims 2, 4-9, 11-12 and 14 are dependent on Claim 1, Claims 16-22 and 24-25 are dependent on Claim 15, and Claims 29-32 are dependent on Claim 27, and recite additional features of the present claimed invention.

Claim 1 recites that an embodiment of the present invention is directed to a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier, "wherein said unique object identifier is unique" (emphasis added). Independent Claim 15 recites that an embodiment of the present invention is directed to a mass storage unit comprising a microcontroller used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique." Independent Claim 27 recites that an embodiment of the present invention is directed to a mass storage unit comprising a microcontroller means used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique."

"Unique," as commonly used, refers to "being the only one of its kind," for example. The instant specification, beginning at line 20 on page 18 and continuing through line 19 on page 19, states in part that, in one embodiment, "each object identifier on HDD unit 60 is unique not just for that HDD unit but it is also unique for all units" (emphasis added).

Applicant respectfully agrees with the Examiner's statement that Maruyama fails to disclose an object identifier that is unique, as recited in independent Claims 1, 15 and 27. Applicant respectfully submits that Yuen does not overcome the shortcomings of Maruyama, and respectfully disagrees with the Examiner's assertion otherwise.

Applicant understands Yuen to describe an addressing system that uses a "VISS PLUS TP data packet address system." VISS (video index search system) is a conventional mechanism for inserting a marker at a user-selected point in a recorded video tape, but provides no mechanism for uniquely identifying an object. A TP data packet, as described by Yuen, comprises a TID (tape identifier) and a program number (column 16, lines 19-22, of Yuen). Significantly, according to Yuen, the TP data packet is provided in the VBI (vertical blanking interval) that is part of a broadcast video signal (column 7, lines 25-26, of Yuen). Thus, Applicant respectfully asserts that there is nothing unique about a TP data packet. Each unit receiving the broadcast signal will receive the same TP data packet. Hence, each unit receiving the broadcast signal will assign the same identifier to all video tapes that record that broadcast signal. Indeed, Applicant understands that to be a key aspect of Yuen because an object of Yuen is to monitor the selection habits of viewers of video tapes; as such, a naming convention uniform across video tapes would be preferred by Yuen. As such, Applicant respectfully submits that Yuen does not show or suggest an object identifier that is unique across storage units.

Specifically, Applicant respectfully submits that Yuen, alone or in combination with Maruyama, does not show or suggest a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier, "wherein said unique object identifier is unique," as recited in independent Claim 1. Applicant also respectfully submits that Yuen, alone or in combination with Maruyama, does not show

or suggest a mass storage unit comprising a microcontroller used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique," as recited in independent Claim 15. In addition, Applicant respectfully submits that Yuen, alone or in combination with Maruyama, does not show or suggest a mass storage unit comprising a microcontroller means used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique," as recited in independent Claim 27.

Thus, Applicant respectfully submits that Maruyama and Yuen, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1, 15 and 27, and that these claims are in condition for allowance. Also, Applicant respectfully submits that Maruyama and Yuen (alone or in combination) do not show or suggest the additional claimed features of the present invention as recited in Claims 2, 4-9, 11-12 and 14 dependent on Claim 1, Claims 16-22 and 24-25 dependent on Claim 15, and Claims 29-32 dependent on Claim 27, and that these claims are in condition for allowance as being dependent on allowable base claims.

Claims 3 and 28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Maruyama in view of Yuen and further in view of Taira ("Taira '098;" US 6,415,098). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 3 and 28 is not anticipated nor rendered obvious by Maruyama, Yuen and Taira '098, alone or in combination.

Claim 3 is dependent on independent Claim 1, and Claim 28 is dependent on independent Claim 27. As described above, Applicant respectfully submits that Maruyama and Yuen, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 27.

Applicant respectfully submits that Taira '098 does not overcome the shortcomings of Maruyama and Yuen. Taira '098, alone or in combination with Maruyama and Yuen, also does not show or suggest a unique object identifier that is unique as recited by independent Claims 1 and 27. Accordingly, Applicant respectfully submits that Maruyama, Yuen and Taira '098, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 27, and that these claims are in condition for allowance. Therefore, Applicant respectfully submits that Maruyama, Yuen and Taira '098 (alone or in combination) also do not show or suggest the additional claimed features of the present invention as recited in Claims 3 and 28, and that these claims are in condition for allowance as being dependent on allowable base claims.

Claims 10, 13, 23 and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Maruyama in view of Yuen and further in view of Nakatani et al. ("Nakatani;" US 6,370,325). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 10, 13, 23 and 26 is not anticipated nor rendered obvious by Maruyama, Yuen and Nakatani, alone or in combination.

Claims 10 and 13 are dependent on independent Claim 1, and Claims 23 and 26 are dependent on independent Claim 15. As described above, Applicant respectfully submits that Maruyama and Yuen, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 15.

Applicant respectfully submits that Nakatani does not overcome the shortcomings of Maruyama and Yuen. Nakatani, alone or in combination with Maruyama and Yuen, also does not show or suggest a unique object identifier that is unique as recited by independent Claims 1 and 15. Accordingly, Applicant respectfully submits that Maruyama, Yuen and Nakatani, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 15, and that these claims are in condition for allowance. Therefore, Applicant respectfully submits that Maruyama, Yuen and Nakatani (alone or in combination) also do not show or suggest the additional claimed features of the present invention as recited in Claims 10, 13, 23 and 26, and that these claims are in condition for allowance as being dependent on allowable base claims.

### CONCLUSION

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected Claims.

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-32 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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